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'ALSO ADMITTED IN VIRGINIA

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January 27, 1992

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RICHARD G. GAY

OF COUNSEL

TELECOPIER NO.

(202) 298-6375

Donna R. Searcy Secretary Federal Communications Commission Washington, D.C. 20554

Federal Communications Commission Office of the Secretary

JAN 2 7 1992

WHFT-TV, Miami, Florida, BRCT-911001LY

Dear Ms. Searcy:

Transmitted herewith, on behalf of Trinity Broadcasting of Florida, Inc. (TBF), is an original and four copies of its "Motion For Extension of Time" filed in connection with the above-referenced proceeding.

Should any questions arise concerning this matter, kindly contact the undersigned directly.

Respectfully submitted,

MAY & DUNNE, CHARTERED

Joseph E. Dunne III

Attorney for Trinity Broadcast-

ing of Florida, Inc.

JED:gmcB26

All Per Attached Certificate of Service

# RECEIVED

#### BEFORE THE

# **Federal Communications Commission**

JAN 2 7 1992

WASHINGTON, D.C. 20554

Federal Communications Commission Office of the Secretary

In Re: Application of:	<b>)</b>	
TRINITY BROADCASTING OF FLORIDA, INC.	) File No. BRCT-911001LY )	
For Renewal of License of Commercial Television Station WHFT-TV. Miami, Florida	) ) )	

To: The Commission

### MOTION FOR EXTENSION OF TIME

Trinity Broadcasting of Florida, Inc. ("TBF"), by its undersigned attorneys, and pursuant to section 1.46 of the Commission's rules and regulations, 47 C.F.R. § 1.46 (1991), hereby respectfully requests a short extension of time within which to submit its opposition to the Petition to Deny ("Petition") filed by Glendale Broadcasting Company ("Glendale"). As grounds for its request TBF shows and states as follows:

- 1. The Petition at issue here is only one of two (2) petitions to deny filed against TBF's renewal application. The second petition to deny TBF's renewal application was filed by the Spanish American League Against Discrimination ("SALAD") on January 2, 1992. The opposition to that petition is due to be filed on February 3.
- 2. The petition to deny filed by SALAD makes many of the same allegations, and relies on many of the same facts as does Glendale's petition. There is a great deal of legal overlap in the issues raised between the two petitions. It would, accordingly, be a great deal more convenient for all parties if TBF were to file a

consolidated opposition to the Petitions, rather than two oppositions, one of which would largely duplicate the earlier filing.

- 3. The extension requested herein is short, only one week in length, and does not inconvenience either the Commission's staff or the other parties to the proceeding. All parties, particularly the Commission staff, will benefit from a uniform pleading schedule.
- 4. Glendale's counsel has authorized the undersigned to represent that Glendale will interpose no objection to the extension requested herein.

wherefore, the following premises considered, Trinity Broad-casting of Florida, Inc. respectfully requests a short extension of time, to and including February 3, 1992, to submit its opposition to the Petition to Deny filed by Glendale Broadcasting Company.

Respectfully submitted,

TRINITY BROADCASTING OF FLORIDA, INC.

By:

Colby M. May

By: My C Cluxe III

## CERTIFICATE OF SERVICE

I, Glinda M. Corbin, a secretary in the law offices of May & Dunne, Chartered hereby certify that I have caused to be sent this 27th day of January, 1992, via first class U.S. mail, postage prepaid, a copy of the foregoing MOTION FOR EXTENSION OF TIME to the following:

Lewis I. Cohen, Esq.
Cohen & Berfield, P.C.
1129 20th Street, N.W., Suite 507
Washington, D.C. 20036
(Counsel for Glendale Broadcasting Company)

Eduardo Peña, Esq. Peña, Aponte and Tsaknis 1101 14th Street, N.W. Washington, D.C. 20005

and

David Honig, Esq.
1800 N.W. 187th Street
Miami, Florida 33056
(Counsel for Spanish American League Against
Discrimination)

By: //wda //. (dinda M. Corbin